

Exhibit 1

Reply Brief in Support of Dr. Abdullah Naseef's
Motion to Dismiss the Third Amended Complaint

03 MDL No. 1570 (RCC) / C.A. No. 03-CV-9849 (RCC)



FROM THE OFFICE OF PUBLIC AFFAIRS

September 6, 2002
PO-3397

Treasury Department Statement on the Designation of Wa'el Hamza Julidan

Today the United States and Saudi Arabia jointly designated Wa'el Hamza Julaidan, an associate of Usama bin Laden and a supporter of al-Qa'ida terror. We are pleased to be taking our second joint action with the Kingdom of Saudi Arabia to publicly identify and freeze the assets of terrorists and their supporters. The Kingdom of Saudi Arabia has already forwarded his name to the United Nations Sanctions Committee established by UNSCR 1267. Today's designation follows a series of joint actions with our allies in the war on terrorist financing, which to date has included actions with the EU, the G-7 countries, Italy, and now our second joint action with Saudi Arabia.

Today's action brings the total number of names to 236 under President Bush's Executive Order aimed at freezing the assets of terrorists and their supporters – Executive Order 13224. Together with our allies we have blocked over \$112 million in terrorist related assets around the world. "Today's action is important in that it demonstrates the commitment of both the United States and Saudi Arabia to go after high impact targets in our war against terrorist financing," said Treasury Under Secretary for Enforcement Jimmy Gurulé. "We have received unprecedented cooperation from our friends abroad, and today's action is indicative of that synergy and commitment to this issue."

Usama bin Laden and a top al-Qa'ida lieutenant, Abu Zubaida, have acknowledged Wa'el Julaidan as a known associate of their operations. Julaidan has been the head of various non-governmental organizations providing financial and logistical support to the al-Qa'ida network.

Statement of the Case for

Wa'el Hamza JULAI DAN

Identifier Information

Wa'el Hamza JULAI DAN a.k.a. Wa'il Hamza JULAI DAN a.k.a.

Wa'el Hamza JULAYDAN a.k.a. Wa'il Hamza JULAYDAN a.k.a.

Wa'el Hamza JALAI DAN a.k.a. Wa'il Hamza JALAI DAN a.k.a.

Wa'el Hamza JALADIN a.k.a. Wa'il Hamza JALADIN a.k.a. Abu

Al-Hasan al Madani

DOB: January 22, 1958

POB: Al-Madinah, Saudi Arabia

Background Information

Wa'el Hamza Julaidan, a Saudi citizen, is an associate of Usama bin Laden. Julaidan fought with bin Laden in Afghanistan in the 1980s. Julaidan is also associated with several individuals and entities linked to al-Qa'ida, including bin Laden lieutenants, Ayman al-Zawahri, Abu Zubaida, and Mohammed Atef; and the organizations: Makhtab al Khedmat, the Rabita Trust, and al-Gam'a al-Islamiya. These individuals and entities have been previously designated under President Bush's Executive Order and by the United Nations.

Bin Laden himself acknowledged his close ties to Julaidan during a 1999 interview with al-Jazeera TV. When referring to the assassination of al-Qa'ida co-founder Abdullah Azzam, bin Laden stated that "We were all in one boat, as is known to you, including our brother, Wa'el Julaidan." Julaidan has established contacts with several known Arab Islamic extremists, including bin Laden's principal lieutenant, Ayman al-Zawahri. Another bin Laden lieutenant, Abu Zubaida, claimed that he accompanied Julaidan from Pakistan to Kandahar, Afghanistan during the summer of 2000. Zubaida said that Julaidan met with bin Laden and senior bin Laden lieutenant Mohammed Atef soon after arriving in Kandahar.

In February 2000, Julaidan was appointed to the Board of Trustees of the Rabita Trust and served as its Director General. The Rabita Trust is an NGO designated under President Bush's Executive Order as an organization that provided logistical and financial support to al-Qa'ida.

Basis for Designation

The United States has credible information that Wa'el Hamza Julaidan is an associate of Usama bin Laden and several of bin Laden's top lieutenants. Julaidan has directed organizations that have provided financial and logistical support to al-Qa'ida. Accordingly, the United States is designating Julaidan under Executive Order 13224 as a person who supports terror.